## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AM	IERICA,	)	
	Plaintiff,	)	
vs.		) ) NO.	3:21-CR-30156-DWD
RICKY PERRY,		)	
	Defendant.	)	

## **STIPULATION OF FACTS**

Comes now Stephen D. Weinhoeft, United States Attorney for the Southern District of Illinois through Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, Ricky Perry, represented by his attorney Talmage Newton, pertaining to the relevant conduct of the defendant within the scope of U.S.S.G. §1B1.3.

- Ricky Perry was employed with the Village of Alorton Police Department. Ricky Perry
  was a patrol officer that was assigned to patrol the Village of Alorton and to respond to police calls.
   Perry began his employment with the Village of Alorton in August of 2017.
- 2. Village of Alorton Police Department Orders require all officers to clock in at the beginning of each shift and clock out at the end of the shift. Police Department Orders also mandate that no officer has authorization to drive a patrol vehicle while not on duty without the permission of the Chief of Police. The Orders also require that any officer who leaves the venue must have authorization by the Chief of Police or Shift Commander when applicable. Also, all officers must notify the dispatcher of his/her departure from venue and of his/her return.

- 3. The Village of Alorton is an impoverished town with a diminishing population in a high crime area. As of May of 2021, the village ceased to exist and was incorporated into the new city of Cahokia Heights.
- 4. Special Agents with the Federal Bureau of Investigation compared GPS records of patrol vehicles used by Ricky Perry with timecards submitted by Ricky Perry for the time period of May 2018 through April 14, 2021. It was determined during the federal investigation that during an approximate three year period, Ricky Perry falsified time records for payment from the Village of Alorton in an amount of approximately \$60,000 representing approximately 4000 hours where Ricky Perry claimed that he was working but instead he was outside the jurisdiction of the Village of Alorton without authority for personal reasons, usually at his residence in East St. Louis.
- 5. The Village of Alorton and its Police Department was a component of city government. The Village of Alorton, Illinois received more than \$10,000 of federal program funds in a one-year period from the time period of Ricky Perry's fraudulent receipt of funds from the Village of Alorton. These federal payments include \$82,114.21 from the Coronavirus Relief Fund in March of 2021.
- 6. From in or about May, 2020 and continuing through April, 2021, in St. Clair County, Illinois, within the Southern District of Illinois, Ricky Perry, while a sworn police officer with the Village of Alorton. Police Department, and an agent of a local government, did knowingly obtain by fraud property worth at least \$5,000 under the care, custody, and control of the Village of Alorton by submitting falsified timecards for compensation.

SO STIPULATED:

UNITED STATES OF AMERICA

STEVEN D. WEINHOEFT United States Attorney

NORMAN R. SMITH

Assistant United States Attorney

RICKY PERRY Defendant

TALMAGE NEWTON Attorney for Defendant

Date: 8-6-202/

Date